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## MEMO ENDORSED

June 6, 2024

### VIA ECF FILING

Hon. Edgardo Ramos  
U.S. District Court Judge  
U.S. District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Defendants' request to file their reply under seal is granted.  
Defendants are directed to file a redacted version for public  
view. SO ORDERED.

Edgardo Ramos, U.S.D.J.

Dated: 6/7/24  
New York, New York

Amanda Tessar  
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**Re: *Bell Semiconductor, LLC v. Broadcom Corp. et al.*, Case No. 1:24-cv-00156-ER**

Dear Judge Ramos:

We represent the defendants in the above-captioned action. In accordance with Section 3 of Your Honor's Individual Practices, and on consent of the plaintiff, we respectfully request permission to file defendant's Reply in support of defendant's Motion to Dismiss under seal. Specifically, we seek to redact those portions of the Reply that cite to or reveal information regarding confidential provisions of the parties' underlying agreement.

By way of reminder, this is a breach of contract action stemming from a patent assignment agreement between the parties, executed on November 30, 2017. Section 8.1 of the assignment prohibits the parties from disclosing certain terms, which shall be kept "confidential." This confidentiality provision was intended to keep the negotiated terms of the transactions secret from competitors and potential future transactional counterparties.

To comply with Section 8.1 of the assignment, we propose filing our Reply with certain redactions, which are highlighted in the attached documents. The redacted text will be visible to all parties and to the Court but not the general public. A similar application to seal defendant's Memorandum of Law accompanying its Motion to Dismiss was granted by this Court (ECF Dkt. No. 42). The redactions proposed in the current Reply largely mirror the same types of redactions made in defendant's Memorandum of Law in support of defendant's Motion to Dismiss (ECF Dkt. 43).

Thank you for your consideration.

Hon. Edgardo Ramos  
June 6, 2024  
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Sincerely,

*/s/ Amanda Tessar*

Amanda Tessar

cc: All counsel of record (via ECF)